

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

WILLIAM GEORGE MOON,

Defendant.

INDICTMENT

The Grand Jury charges:

Travel with Intent to Engage in Illicit Sexual Conduct

On or about March 19, 2024, in Kent County, in the Southern Division of the Western District of Michigan, and elsewhere,

WILLIAM GEORGE MOON

traveled in interstate commerce with a motivating purpose of engaging in illicit sexual conduct, as defined in Title 18, United States Code, Section 2423(g), with another person under 18 years of age. Specifically, defendant traveled from the state of Ohio to the state of Michigan with intent to engage in a sexual act with an individual he believed to be a 12-year-old girl.

18 U.S.C. § 2423(b)

FORFEITURE ALLEGATION
(Interstate Travel with Intent to Engage in Illicit Sexual Conduct)

The allegations contained in this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture pursuant to 18 U.S.C. § 2428.

Pursuant to 18 U.S.C. § 2428, upon conviction of an offense in violation of 18 U.S.C. § 2423(b), as set forth in this Indictment,

WILLIAM GEORGE MOON

shall forfeit to the United States of America, any property, real or personal, used or intended to be used to commit or to facilitate the commission of the offense and any property, real or personal, constituting or derived from any proceeds obtained, directly or indirectly, as a result of the offense. The property to be forfeited includes, but is not limited to the following:

1. LG V60 cellphone, model LM-V600TM, (SN 005VTDN0055962),
2. OnePlus cellular telephone (IMEI# 990016750855239),
3. HTC cellular telephone (MEID# 256691587500202305)
4. Samsung Tablet (SN R52M51A3ESZ),
5. Four (4) thumb drives.

If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or

- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property

pursuant to 21 U.S.C. § 853(p), as incorporated by 28 U.S.C. § 2461(c).

18 U.S.C. § 2428

21 U.S.C. § 853(p)

28 U.S.C. § 2461(c)

18 U.S.C. § 2422(b)

18 U.S.C. § 2423(b)

PRIOR CONVICTION

At the time of the illegal act charged in this Indictment, the defendant, WILLIAM GEORGE MOON, had a prior sex offense conviction under State law for an offense consisting of conduct that would have been an offense under Chapter 109A, 110, 117 or 18 U.S.C. § 1591 if the conduct had occurred within the special maritime and territorial jurisdiction of the United States.

Specifically, on July 13, 2006, WILLIAM GEORGE MOON, in Franklin County, Ohio, in the Franklin County Municipal Court (case number 1-05-002965), was convicted of one count of importuning, in violation of Ohio Revised Code Section 2907.07(D)(2), that is, the defendant “did knowingly solicit a person to wit: [a police officer] posing on the internet as a fourteen year old female, to engage in sexual activity[.]”

18 U.S.C. § 2426

A TRUE BILL

[/s/ Redacted]

GRAND JURY FORPERSON

MARK A. TOTTON
United States Attorney



DANIEL Y. MEKARU
Assistant United States Attorney